BEFORE THE
POSTAL RATE COMMISSION JUL

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PATELUNAS TO INTERROGATORY OF TIME WARNER, INC. (TW/USPS-ST44-1)

WASHINGTON, D.C. 20268-0001

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of Time Warner, Inc.: TW/USPS-ST44-1, filed on July 14, 2000. Interrogatories TW/USPS-ST44-2 and 3 were redirected to the Postal Service.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 July 28, 2000

## Response of United States Postal Service witness Patelunas to Interrogatories of Time Warner Inc.

**TW/USPS-ST44-1.** Please confirm that the calculations performed by yourself and witness Kay (USPS-ST-45) depend on first having determined BY99 volume variable costs per subclass and special service for each cost segment. If not confirmed, please explain.

**Response** Confirmed that the calculations performed by myself and witness Kay (USPS-ST-45) depend on first having had the Postal Service determine the BY99 volume variable costs per subclass and special service for each cost segment.

## **DECLARATION**

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

Dated: 7/28/00

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, J.C. 20260–1137 (202) 268–299J Fax –5402 July 28, 2000